UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MARYLAND

DEBORAH BELLE,	
Individually, and on behalf)
of all others similarly situated,)
•)
Plaintiffs,) NO. L 02 CV 3309
)
V.)
)
NCO FINANCIAL SYSTEMS, INC.,)
A Pennsylvania Corporation)
•)
and)
)
JOHN DOE)
)
Defendants.)

DEFENDANT'S REPLY TO PLAINTIFF'S MOTION TO EXTEND DISCOVERY TIME PERIOD

The Defendant, NCO Financial Systems, Inc. ("NCO"), by its attorneys, replies to the Motion to Extend Discovery Time Period ("Motion") filed by the Plaintiff, Deborah Belle ("Belle"), and says:

- 1. The Defendant has been working with the Plaintiff's attorney in an attempt to schedule the depositions requested by the Plaintiff at a mutually convenient time. It is the Defendant's intent to continue to cooperate in this manner. The last time counsel for both parties discussed this issue was in early December, and the holiday period has made it difficult to obtain dates for depositions. NCO will be providing Plaintiff's counsel in the near future with dates and times for the depositions requested by Plaintiff.
- 2. NCO does not oppose or object to the extension of the discovery period requested by the Plaintiff.

Respectfully Submitted,

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Facsimile: 504-582-1555 Attorneys for Defendant, NCO Financial Systems, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of January, 2004, a copy of the foregoing Defendant's Reply to Plaintiff's Motion to Extend Discovery Period was served by first-class U.S. mail postage prepaid to the following:

Lisa M. Raimondi, Esquire Raimondi & Orton, Ltd. 4305 N. Lincoln Avenue Chicago, Illinois 60618

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Jonathan E. Claiborne